Michael Faillace & Associates, P.C.

Employment and Litigation Attorneys

60 East 42nd Street, Suite 4510 New York, New York 10165

catalina@faillacelaw.com

Telephone: (212) 317-1200 Facsimile: (212) 317-1620

June 22, 2021

VIA ECF

Honorable Jesse M. Furman United States District Judge 40 Centre Street, Room 2202 New York, New York 10007

Re: Gil Sosa et al v. The J R Restaurant Group LLC et al;

Case No. 21-cv-03418-JMF

Your Honor:

This firm represents Plaintiffs in the above referenced matter. We write to respectfully request an extension of time to file our default motion in this matter that is due today. This is the first request of its kind.

The reason for the request is that Plaintiffs, while preparing the default motion materials, recently learned that the Defendant Corporation J R Restaurant Group LLC may not be related to the restaurant doing business as Muscle Maker Grill. Plaintiffs are conducting further research on whether they need to amend the complaint to add a new corporation. Plaintiffs therefore respectfully request a thirty (30) day extension to file their default motion.

We thank the Court for its time and attention in this matter.

Respectfully Submitted,

/s/Catalina Sojo
Catalina Sojo, Esq.

In light of the above, the Order Scheduling Default Judgment Briefing and Show Cause Hearing, dated June 18, 2021, ECF No. 18, is VACATED (although the Clerk of Court can and should leave it on the docket), and the hearing currently scheduled for July 8, 2021 is CANCELED. No later than three weeks from the date of this Order, Plaintiff shall file a status letter updating the Court on how he intends to proceed (i.e., whether to move for default judgment, dismiss his claims, file an amended complaint, etc.). The Clerk of Court is directed to terminate ECF No. 21.

Certified as a minority-owned business in the State of New York

June 23, 202

SO ORDERED.